

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

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JENNIFER BOSHAW,)
Plaintiff,)
v.)
FINANCIAL RECOVERY)
SERVICES, INC.,)
Defendant.)

CASE NO. **2 13 CV 002**

DEFENDANT FINANCIAL RECOVERY SERVICES, INC.'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Financial Recovery Services, Inc. ("FRS") hereby removes the subject action from the Porter Superior Court, Porter County, Valparaiso, Indiana, to the United States District Court for the Northern District of Indiana, Hammond Division, on the following grounds:

1. Plaintiff Jennifer Boshaw served FRS on or about December 10, 2012, with a Summons and Complaint filed in the Porter Superior Court, Porter County, Valparaiso, Indiana. Copies of the Summons and Complaint are attached hereto as **Exhibit A** and **Exhibit B**. No other process, pleadings or orders have been served on FRS.

2. Plaintiff makes claims under, alleges that FRS violated and alleges that FRS is liable under the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq. (the "FDCPA"). See Complaint ¶¶ 1, 4, 10 and 12-16.

3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FDCPA which thus supplies this federal question.

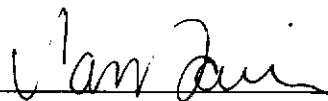
4. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the Porter Superior Court, Porter County, Valparaiso, Indiana, to the United States District Court for the Northern District of Indiana, Hammond Division.

5. Notice of this removal will promptly be filed with the Porter Superior Court, Porter County, Valparaiso, Indiana and served upon all adverse parties.

WHEREFORE, Defendant Financial Recovery Services, Inc., by counsel, removes the subject action from the Porter Superior Court, Porter County, Valparaiso, Indiana to this United States District Court, Northern District of Indiana, Hammond Division.

Dated: December 31, 2012.

Respectfully submitted,

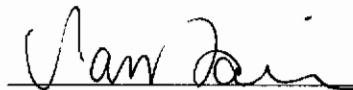

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*Counsel for Defendant Financial
Recovery Services, Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been deposited into the United States mail, first class, properly addressed as follows, this **31st** day of **December, 2012**:

Michael P. McIlree, Esq. 15 Main Street Hobart, IN 46342	
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Robert J. Schuckit, Esq. (Atty. #15342-49)

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